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9 *Attorneys for Plaintiffs*

10 **IN THE DISTRICT COURT  
11 FOR THE NORTHERN MARIANA ISLANDS**

12 **ÖZCAN GENÇ, HASAN GÖKÇE, and ) Case No. 1:20-CV-00031**  
13 **SÜLEYMAN KÖŞ, on behalf of themselves )**  
14 **and all others similarly situated, )**  
15 **Plaintiffs, )**  
16 **vs. )**  
17 **IMPERIAL PACIFIC INTERNATIONAL )**  
18 **(CNMI), LLC, IMPERIAL PACIFIC )**  
19 **INTERNATIONAL HOLDINGS LTD., and )**  
20 **IDS DEVELOPMENT MANAGEMENT & )**  
21 **CONSULTANCY, )**  
22 **Defendants. )**  
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19 On October 5, 2022, Plaintiffs filed a Motion to Approve Compromise Settlement of  
20 FLSA Judgment (ECF No. 68). In the Motion, Plaintiffs indicated that the proposed  
21 compromise settlement in the amount of \$450,000 (not including attorney fees and costs) would  
22 fully compensate each FLSA collective action member for unpaid wages and liquidated  
23 damages, and that the compromise would affect only punitive damages. Plaintiffs hereby submit  
24 a proposed distribution.

25 The total amount of the FLSA Judgment (ECF No. 57), exclusive of attorney fees and  
26 costs and post-judgment interest, is \$477,935.91. Of this amount, \$312,288.91 is for unpaid  
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wages and liquidated damages, and \$165,657.00 is for punitive damages (Decision and Order, ECF No. 52, p. 2). Under the settlement with IPI, after full payment of the award for unpaid wages and liquidated damages, there remains \$137,711.09 as the compromise of punitive damages. This represents a discount of 16.86472 percent.

In the following chart, the first column shows the punitive damages the Court awarded each member of the collective, as set forth in the Decision and Order, p. 34; the second column shows punitive damages to each member after applying the settlement discount. The remaining columns show full unpaid wages, full liquidated damages, and the total payout to each member under the compromise settlement.

Name	Punitive Damages	Punitives under settlement (16.86472% discount)	Unpaid Wages	Liquidated damages	Total Settlement Amount
Ahmet Kızmaz	\$ 5,500.00	\$ 4,572.44	\$ 680.66	\$ 9,056.82	\$ 14,309.91
Ahmet Küçükburman	\$ 5,500.00	\$ 4,572.44	\$ 776.09	\$ 9,056.82	\$ 14,405.35
Ali Çakır	\$ 5,500.00	\$ 4,572.44	\$ 852.00	\$ 9,056.82	\$ 14,481.26
Ali Güneş	\$ 5,500.00	\$ 4,572.44	\$ 1,905.90	\$ 9,935.38	\$ 16,413.72
Deniz Öztürk	\$ 5,500.00	\$ 4,572.44	\$ 863.96	\$ 9,056.82	\$ 14,493.22
Ebubekir Gül	\$ 5,500.00	\$ 4,572.44	\$ 863.95	\$ 9,056.82	\$ 14,493.21
Ertan Gül	\$ 5,500.00	\$ 4,572.44	\$ 1,458.32	\$ 9,935.38	\$ 15,966.14
Fuat Mert Öztuna	\$ 1,747.00	\$ 1,452.37	\$ -	\$ 29,307.75	\$ 30,760.12
Gökhan Güneş	\$ 5,500.00	\$ 4,572.44	\$ 991.48	\$ 9,056.82	\$ 14,620.74
Hasan Gökçe	\$ 8,800.00	\$ 7,315.90	\$ 14.30	\$ 9,935.38	\$ 17,265.58
İdris Kocamaz	\$ 5,500.00	\$ 4,572.44	\$ 964.59	\$ 9,056.82	\$ 14,593.85
Kadir Mucur	\$ 5,500.00	\$ 4,572.44	\$ 1,184.91	\$ 9,056.82	\$ 14,814.17

1	Mehmet Barış DerintAŞ	\$ 5,500.00	\$ 4,572.44	\$ 680.68	\$ 9,056.82	\$ 14,309.94
2	Mehmet Çerçibaşı	\$ 5,500.00	\$ 4,572.44	\$ 863.96	\$ 9,056.82	\$ 14,493.22
3	Mehmet Karakaya	\$ 8,800.00	\$ 7,315.90	\$ 680.66	\$ 9,056.82	\$ 17,053.38
4	Muharrem Başaran	\$ 5,500.00	\$ 4,572.44	\$ 863.97	\$ 9,056.82	\$ 14,493.23
5	Mükremin Çobanpinari	\$ 5,500.00	\$ 4,572.44	\$ 935.63	\$ 9,056.82	\$ 14,564.89
6	Mustafa Doğan	\$ 5,500.00	\$ 4,572.44	\$ 1,470.67	\$ 9,056.82	\$ 15,099.93
7	Mustafa Orçun	\$ 5,500.00	\$ 4,572.44	\$ 680.68	\$ 9,056.82	\$ 14,309.94
8	Őmer Dönmez	\$ 5,500.00	\$ 4,572.44	\$ 863.96	\$ 9,056.82	\$ 14,493.22
9	Osman Güneş	\$ 5,500.00	\$ 4,572.44	\$ 985.96	\$ 9,056.82	\$ 14,615.22
10	Osman Yentür	\$ 5,500.00	\$ 4,572.44	\$ 890.37	\$ 9,056.82	\$ 14,519.63
11	Őzcan Genç	\$ 8,800.00	\$ 7,315.90	\$ -	\$ 9,935.38	\$ 17,251.28
12	Ramazan Atasoy	\$ 5,500.00	\$ 4,572.44	\$ 863.96	\$ 9,056.82	\$ 14,493.22
13	Ramazan Tekten	\$ 5,500.00	\$ 4,572.44	\$ 304.37	\$ 9,056.82	\$ 13,933.63
14	Sakin Polat	\$ 5,500.00	\$ 4,572.44	\$ 412.09	\$ 9,056.82	\$ 14,041.35
15	Sezai Kaya	\$ 5,500.00	\$ 4,572.44	\$ 935.63	\$ 9,056.82	\$ 14,564.89
16	Suleyman Köş	\$ 5,500.00	\$ 4,572.44	\$ 2,003.20	\$ 9,935.38	\$ 16,511.02
17	Tuncay Yarbaşı	\$ 5,500.00	\$ 4,572.44	\$ 1,005.58	\$ 9,056.82	\$ 14,634.84
18	<b>Total:</b>	<b>\$ 165,647.00</b>	<b>\$ 137,711.10</b>	<b>\$ 24,997.53</b>	<b>\$ 287,291.38</b>	<b>\$ 450,000.01</b>

Counsel will send the Excel spreadsheet from which this chart was copied to the Court's USDCNMI address. If the Court approves this distribution, the extra penny (\$450,000.01) can be taken from the compromise settlement of attorney fees and costs.

Respectfully submitted this 6th day of October, 2022.

1 BANES HOREY BERMAN & MILLER, LLC  
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